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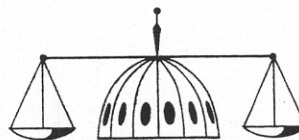
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Defense Acquisition Regulations Council

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DFARS Case 2002-D003

The Coalition is pleased to provide its comments and views regarding the promulgation of an interim rule amending the Defense Federal Acquisition Regulation Supplement to implement Section 811 of the Fiscal Year 2002 National Defense Authorization Act.

Overall, we believe the rule as proposed and written is fairly clear and closely follows the intent of Congress.

However, there are a few issues we believe need to be addressed before a final rule is issued. Some of these issues are based on lapses in language and/or meanings in the construction of parts of the rule that make it less than crystal clear. Others, unfortunately, are based on negating the totally false and misleading comments and interpretations currently being used by FPI to eviscerate not only the words in the rule but the actual intent of Congress.

208.602 Policy

We recommend that the words "**FPI Schedules**" in first sentence of paragraph (a) be changed to read "**FPI Catalog**". This change will bring the language of the rule into line with Section 811 in the law as well as the background information in the Federal Register. Congress was specific in stating "**.....the latest edition of the FPI catalog.**" FPI Schedules are entirely different than the FPI catalog. To use the word schedules rather than the word catalog is to change the words and intent of Congress.